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★ JAN 24 2020 ★
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. § 846)

RONALD BOWMAN, and
DANIEL SEMPLE,
also known as "Hunter Barnes,"
"Dean Foster," and "James Sicatto,"

Defendants.

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WJ 20-0084

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EASTERN DISTRICT OF NEW YORK, SS:

KEITH E. KRAYEWSKI, being duly sworn, deposes and states that he is a Special Agent with the Internal Revenue Service, Criminal Investigation Division, duly appointed according to law and acting as such.

On or about and between January 1, 2019 and January 23, 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RONALD BOWMAN and DANIEL SEMPLE, also known as "Hunter Barnes," "Dean Foster," and "James Cicatto," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved 100 kilograms or more of a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(vii))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the Internal Revenue Service, Criminal Investigation Division ("IRS-CID") and have been involved in the investigation of numerous cases involving illegal drug trafficking and money laundering. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendants' criminal history records; and from reports of other law enforcement officers involved in the investigation.

2. Since January 2019, an investigation by the United States Drug Enforcement Administration ("DEA") and IRS-CID revealed that the defendants RONALD BOWMAN and DANIEL SEMPLE, also known as "Hunter Barnes," "Dean Foster," and "James Cicatto," together with others, have been running a large-scale marijuana trafficking and money laundering scheme involving the covert transportation of at least 20 separate multi-hundred pound quantities of marijuana from California to Long Island with a total street value of millions of dollars.

3. In order to facilitate the scheme, defendants RONALD BOWMAN and/or DANIEL SEMPLE, also known as "Hunter Barnes," "Dean Foster," and "James Cicatto," would travel to California to purchase bulk quantities of marijuana, which is then stored in a self-storage unit in Hayward, California that is rented by SEMPLE. SEMPLE then purchases wheels and tires in California, secrets the marijuana inside the tires at the self-

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

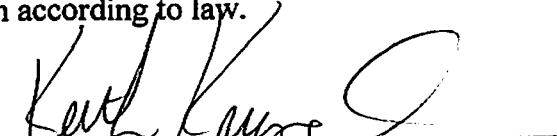
storage unit and prepares the concealed marijuana for shipment to Long Island. SEMPLE then uses a shipping company to transport the concealed marijuana to a tire shop located in Islip, New York. Once the concealed marijuana is delivered to the tire shop, the marijuana is removed from the wheels and tires and placed in cardboard boxes. SEMPLE then rents a van or truck, picks up the boxes of marijuana and delivers the marijuana to BOWMAN – at his residence in Copiague, New York – and others for distribution or retains some for sales to his own customers.

4. On January 22, 2020, the Honorable Anne Y. Shields, United States Magistrate Judge for the Eastern District of New York, issued search warrants for the residences of the defendants RONALD BOWMAN and DANIEL SEMPLE, also known as “Hunter Barnes,” “Dean Foster,” and “James Cicatto.” Prior to obtaining the search warrants, the DEA and IRS-CID were tracking a suspected shipment of marijuana consistent with the manner in which BOWMAN and SEMPLE had coordinated prior bulk shipments of marijuana (*i.e.* by secreting the marijuana in wheels and tires from California for delivery to the tire shop in Central Islip, New York).

5. On January 23, 2020, the DEA and IRS-CID observed the defendant DANIEL SEMPLE, also known as “Hunter Barnes,” “Dean Foster,” and “James Cicatto,” rent a U-Haul truck and purchase cardboard boxes. Later that day, SEMPLE was observed traveling to the tire shop in Islip, New York and then traveling to defendant RONALD BOWMAN’s residence in Copiague, New York. Subsequent to SEMPLE’s arrival at BOWMAN’s residence, the DEA and IRS-CID executed the search warrants at the two locations. Inside BOWMAN’s residence, the DEA and IRS-CID observed an “indoor marijuana grow” operation in the basement of the residence as well as recovered, among

other things, hundreds of pounds of suspected marijuana, digital scales, money counters, and drug ledgers. Cardboard boxes were also found to contain suspected marijuana which were consistent with the boxes obtained by SEMPLE. The U-Haul truck rented by SEMPLE was located in the back of the BOWMAN property with the rear lift gate open, which revealed in plain view multiple cardboard boxes containing suspected marijuana in sealed packaging. A strong odor of marijuana emanated from the U-Haul truck and a trained Suffolk County Police Department canine alerted to the presence of a controlled substance in the rear of the van. Subsequent to the search of BOWMAN's residence, BOWMAN and SEMPLE were placed under arrest. During the search of SEMPLE's residence in Mineola, New York, agents recovered suspected quantities of marijuana in sealed bags, shipping labels and records for prior shipments of wheels and tires suspected of containing marijuana, a money counter, numerous receipts of postal money orders, photo identification documents in known aliases of SEMPLE, including "Dean Foster," a cell-phone jammer, two firearms, ammunition and a bullet-proof vest.

WHEREFORE, your deponent respectfully requests that the defendants RONALD BOWMAN and DANIEL SEMPLE, also known as "Hunter Barnes," "Dean Fostér," and "James Cicatto," be dealt with according to law.



KEITH E. KRAYEWSKI
Special Agent, Internal Revenue Service

Sworn to before me this
24th day of January, 2020



THE HONORABLE A. KATHLEEN TOMLINSON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK